

**FILED**

January 25, 2023

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND/ODESSA DIVISION

BY: J. Barker  
DEPUTY

UNITED STATES OF AMERICA

Plaintiff

v

JOSE ESTRADA-AGUIRRE

Defendant

SUPERSEDING INDICTMENT

**7:22-CR-00108**

COUNT 1: 18 U.S.C. 1542 – False  
Statement in Application for Passport

**THE GRAND JURY CHARGES:**

**COUNT ONE**  
**[18 U.S.C. 1542]**

On or about February 28, 2013, in the Western District of Texas, Defendant,

**JOSE ESTRADA-AGUIRRE,**

willfully and knowingly made a false statement in an application for a passport with intent to induce and secure for his own use the issuance of a passport under the authority of the United States, to wit: 1.) JOSE ESTRADA-AGUIRRE listed his name as “Jose Lopez Aguirre”; 2.) JOSE ESTRADA-AGUIRRE listed his place of birth as “Hot Springs, Texas,”; 3.) JOSE ESTRADA-AGUIRRE stated he had never used another name; and 4.) JOSE ESTRADA-AGUIRRE declared that he had never been convicted of a federal or state drug offense which statements he knew to be false contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that, in violation of Title 18, United States Code, Section 1542.

**COUNT TWO**  
**[18 U.S.C. 1621]**

On or about February 28, 2013, in the Western District of Texas, Defendant,

**JOSE ESTRADA-AGUIRRE,**

willfully and knowingly subscribed as true any material matter in any declaration, certificate, verification, or statement under penalty of perjury as permitted under Section 1746 of Title 28, United States Code, to wit: a signed declaration on an application for a United States passport, which he knew to be false, contrary to the rules prescribed pursuant to such laws, in violation of Title 18, United States Code, Section 1621(2).

A TRUE BILL,

Original Signed by the  
Foreperson of the Grand Jury

\_\_\_\_\_  
FOREPERSON

JAIME ESPARZA  
United States Attorney

By: \_\_\_\_\_

Mary Lopez

Assistant United States Attorney